

SILLS CUMMIS & GROSS P.C.  
Jaimee Katz Sussner, Esq.  
Joshua N. Howley, Esq.  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 643-7000

*Attorneys for Court-Appointed Receiver  
Colliers International NJ, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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U.S. BANK NATIONAL ASSOCIATION,	: Civil Action No. 19-cv-17865 (MCA)(LDW)
AS TRUSTEE FOR THE REGISTERED	:
HOLDERS OF WELLS FARGO	:
COMMERCIAL MORTGAGE	: <i>Document Electronically Filed</i>
SECURITIES, INC., MULTIFAMILY	:
MORTGAGE PASS-THROUGH	:
CERTIFICATES, SERIES 2018-SB51, <i>et al.</i> ,	: <b>NOTICE OF MOTION FOR ORDER</b>
	: <b>APPROVING SALE OF CERTAIN</b>
	: <b>PROPERTIES FREE AND CLEAR</b>
Plaintiffs,	:
	:
vs.	: <b>ORAL ARGUMENT REQUESTED</b>
	:
ATLANTIC NORSE, LLC, SETH LEVINE,	:
<i>et al.</i> ,	: <b>Motion Day: July 6, 2021</b>
	:
Defendants.	:
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TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

**PLEASE TAKE NOTICE** that, on July 6, 2021, or as soon thereafter as counsel may be heard, the undersigned counsel for Colliers International NJ LLC, the Court-appointed Receiver for the properties that are subject of the referenced actions (the “Receiver”), shall move before the Honorable Madeline Cox Arleo, U.S.D.J., District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order approving Receiver’s sale of the properties owned by Defendant Atlantic Norse, LLC, free and clear of all

prior encumbrances, liens, rights, and interest, approving the Receiver's disbursement of proceeds from the sale, and for related relief, pursuant to the prior Orders of this Court and Fed. R. Civ. P. 66.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Receiver shall rely on the accompanying Declarations of Richard Madison, Joseph Brecher, and Jaimee Katz Sussner, Esq., with accompanying exhibits, and all pleadings and proceedings on file.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order granting Receiver's Motion is enclosed herewith.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), the Receiver hereby requests oral argument if opposition is filed.

Respectfully submitted,

s/ Jaimee Katz Sussner  
JAIMEE KATZ SUSSNER

*Attorneys for Court-Appointed  
Receiver Colliers International  
NJ LLC*

Dated: June 10, 2021

### SERVICE LIST

1. Atlantic Norse, LLC (*By First Class Mail*)  
c/o Mr. Seth Levine  
636 South Forest Drive  
Teaneck, New Jersey 07666
2. Jacob Kaplan, Esq. (*By Email*)  
Brafman & Associates, P.C.  
767 Third Avenue, 26<sup>th</sup> Floor  
New York, New York 10017  
*Counsel for Defendant Seth Levine*
3. Amy Hatch, Esq. (*By Email*)  
Polsinelli PC  
600 Third Avenue, 42<sup>nd</sup> Floor  
New York, New York 10016  
*Counsel for First Mortgagee*
4. Atlantic City Sewage Company (*By First Class Mail*)  
1200 Atlantic Avenue  
Atlantic City, New Jersey 08401
5. Atlantic City Construction Department (*By First Class Mail*)  
1301 Bacharach Boulevard  
1<sup>st</sup> Floor, Suite 101  
Atlantic City, New Jersey 08401
6. Toledo Plumbing & Heating Inc. (*By First Class Mail*)  
c/o Bittiger Elias & Triolo P.C.  
12 Route 17 North, Suite 206  
Paramus, New Jersey 07652
7. City of Atlantic City (*By First Class Mail*)  
c/o Trenk Dipasquale Della Fera & Sodono P.C.  
n/k/a McManimon Scotland Baumann  
75 Livingston Avenue  
Roseland, New Jersey 07068